



**Eric Gonzalez**  
District Attorney

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KINGS COUNTY**

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**[INSERT NAME]**  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

**MOS NAME: PAULIUS SIMULEVICIUS**

**MOS TAX: [REDACTED]**

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

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**Disclosure # 1:**

ON FEBRUARY 8, 2019, MOS PAULIUS SIMULEVICIUS, SHIELD NUMBER 18796, WAS ARRAIGNED IN KINGS COUNTY CRIMINAL COURT ON A CRIMINAL COMPLAINT (DOCKET NUMBER CR-005356-19KN), CHARGING HIM WITH TWO COUNTS OF OPERATING A MOTOR VEHICLE WHILE UNDER THE INFLUENCE OF ALCOHOL OR DRUGS (VTL 1192(1) AND 1192(3)). THE CHARGES ARE BASED ON THE FOLLOWING ALLEGED CONDUCT: ON FEBRUARY 7, 2019, AT ABOUT 11:49 P.M., MOS SIMULEVICIUS, WHILE OFF DUTY, WAS DRIVING HIS PRIVATE VEHICLE WHEN HE HIT APPROXIMATELY SIX PARKED CARS, ONE OF WHICH HAD A PASSENGER INSIDE. POLICE WHO ARRIVED ON THE SCENE OBSERVED THAT MOS SIMULEVICIUS WAS EXHIBITING SIGNS OF INTOXICATION, IN THAT HE HAD AN UNSTEADY GAIT, RED WATERY EYES, AND A STRONG ODOR OF ALCOHOL ON HIS BREATH. MOS SIMULEVICIUS REFUSED TO SUBMIT TO A CHEMICAL TEST ANALYSIS TO DETERMINE HIS BLOOD ALCOHOL CONCENTRATION.

MOS SIMULEVICIUS PLED GUILTY AND ON 01/15/20 WAS SENTENCED TO VTL 1192.1 (A VIOLATION NOT A CRIME), A CONDITIONAL DISCHARGE, AND A FINE.

AS A RESULT OF THE ABOVE—MOS SIMULEVICIOUS WAS ISSUED CHARGES AND SPECIFICATIONS BY THE NYPD, AND PLED GUILTY TO THE FOLLOWING:

**ALLEGATION(S):**

1. MOS SIMULEVICIUS, ON OR ABOUT AND BETWEEN FEBRUARY 7, 2019 AND FEBRUARY 8, 2019, WHILE OFF-DUTY, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, TO WIT: SAID MOS SIMULEVICIUS WRONGFULLY OPERATED A MOTOR VEHICLE WHILE UNDER THE INFLUENCE OF AN INTOXICANT.
2. SAID MOS SIMULEVICIUS, ON OR ABOUT AND BETWEEN FEBRUARY 7, 2019 AND FEBRUARY 8, 2019, WHILE OFF-DUTY, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, TO WIT: SAID MOS SIMULEVICIUS WRONGFULLY OPERATED A MOTOR VEHICLE WHILE HIS ABILITY TO DO SO WAS IMPAIRED BY AN INTOXICANT.
3. SAID MOS SIMULEVICIUS, ON OR ABOUT AND BETWEEN FEBRUARY 7, 2019 AND FEBRUARY 8, 2019, WHILE OFF-DUTY, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, TO WIT: SAID MOS SIMULEVICIUS CONSUMED AN INTOXICANT TO THE EXTENT THAT HE WAS UNFIT FOR DUTY.
4. SAID MOS SIMULEVICIUS, ON OR ABOUT AND BETWEEN FEBRUARY 7, 2019 AND FEBRUARY 8, 2019, WHILE OFF-DUTY, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE

DEPARTMENT, TO WIT: SAID MOS SIMULEVICIUS WRONGFULLY STRUCK FIVE UNOCCUPIED VEHICLES AND ONE OCCUPIED PARKED CAR WITH HIS PERSONAL VEHICLE, CAUSING DAMAGE TO SAID VEHICLES.

5. SAID MOS SIMULEVICIUS, ON OR ABOUT FEBRUARY 8, 2019, WHILE OFF-DUTY, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, TO WIT: SAID MOS SIMULEVICIUS REFUSED TO SUBMIT TO A CHEMICAL BREATH TEST TO DETERMINE HIS BLOOD ALCOHOL CONCENTRATION.

ACTION TAKEN: THIRTY-ONE (31) PRE-TRIAL SUSPENSION DAYS; COMPLYING WITH ANY AND ALL DEPARTMENTAL COUNSELING PROGRAMS; DISMISSAL PROBATION FOR ONE YEAR AND LOSS OF A TWENTY-FIVE (25) VACATION DAYS.

CASE STATUS: CLOSED ON 09/08/2020.

**Disclosure # 2:**

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 11/12/2018, AGAINST MOS SIMULEVICIUS: ALLEGATION(S):

1. FAIL TO TAKE POLICE ACTION – ON OTHER INCIDENT

ACTION TAKEN: VERBAL INSTRUCTIONS

CASE STATUS: CLOSED ON 02/15/2019

**Disclosure # 3:**

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 06/14/2019, AGAINST MOS SIMULEVICIUS: ALLEGATION(S):

1. FAIL TO PREPARE REPORT - AIDED REPORT

CASE STATUS: CLOSED ON 08/07/2019

**BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH FEBRUARY 1, 2021, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:**

**Disclosure # 4:**

CCRB CASE: 201807943

REPORT DATE: 09/25/2018

[REDACTED]  
[REDACTED]  
[REDACTED]

Eric Gonzalez  
District Attorney  
Kings County